

CYTEC

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June 15, 2005

FEDERAL EXPRESS

Dr. Chuck Carr Brown, Assistant Secretary
Office of Environmental Services
Louisiana Department of Environmental Quality
602 North Fifth Street
Baton Rouge, LA 70802

Re: Cytec Industries Inc.
Agency Interest # 1357
Hazardous Waste Permit #LAD 008 175 390
PER 2005009
Request for Temporary Variance

Dear Dr. Brown:

Please find attached the original certification requested in to your letter dated May 27, 2005 received at the Cytec Industries Inc., Fortier Facility, on June 2, 2005 in regard to the referenced Facility Hazardous Waste Permit. A copy of this document was submitted under separate cover by the Fortier plant as Exhibit C.

Very truly yours,


Thomas E. Mesevage

Enclosure

Cytec Industries Inc.
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West Paterson, NJ 07424
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CERTIFICATION

I, Thomas E. Mesevage, Safety, Health and Environmental Counsel of Cytec Industries Inc., a Delaware corporation, hereby certify as follows:

1. This certification is submitted in support of the May 23, 2005 letter request for an allowance made by Cytec Industries Inc. ("Cytec") with respect to the Hazardous Waste Treatment Storage and Disposal Facility Permit, Permit Number LAD 008 175 390 (the "Permit") issued with respect to Cytec's Waggaman, Louisiana Fortier Plant (the "Fortier Plant"). This certification is also submitted in specific response to the May 27, 2005 correspondence from the Louisiana Department of Environmental Quality (the Department) approving the request for allowance for the remaining term of the Permit.

2. The Permit authorizes Cytec's operation of the following waste management units: Container Storage Building, four storage tanks, ten treatment system tanks associated with the injection well system, eleven sand filters, and four cartridge filter systems associated with the injection well pretreatment systems. In addition, Cytec holds a permit from the Department of Natural Resources ("DNR") for five injection wells used for the injection of hazardous wastes. In 1994, the Department granted a no migration exemption for operation of such injection wells, pursuant to LAC 33:V.Ch.22.

3. Cytec's Fortier Plant is a chemical manufacturing complex with several production units. One unit at the facility, the methyl methacrylate (MMA) plant, is owned by CYRO Industries, a New Jersey general partnership (CYRO). The MMA plant operates on a leasehold granted CYRO at the Fortier Plant by Cytec, the landowner.

4. Prior to May 31, 2005, a wholly-owned Cytec subsidiary, Cytec Plastics LLC, a Delaware limited liability company owned fifty percent of the right, title and interest in CYRO with the remaining fifty percent owned by Rohacryl, Inc., a Delaware corporation and an affiliate of Degussa Specialty Polymers, Inc. a Delaware corporation.

5. Pursuant to a Purchase Agreement dated April 22, 2005 by and between Degussa Specialty Polymers, Inc. and Cytec Plastics LLC, on May 31, 2005, Cytec Plastics LLC sold all of its right, title and interest in CYRO to Degussa Specialty Polymers, Inc. As a result of the transaction, Cytec no longer owned any partnership interest in CYRO. Notably, no physical assets were transferred in connection with Cytec's sale of its partnership; all plant assets owned by CYRO prior to the transaction remained CYRO's following closure of the transaction. No Cytec Fortier Plant assets were transferred to CYRO as a result of the transaction.

6. With respect to the CYRO operations at the Fortier Plant site, as before the transaction, CYRO continues to own the MMA plant following the May 31, 2005 closing. Cytec continues to own the entire property on which Cytec operations and the operations of CYRO are carried out. All employees who participate in the operations of CYRO continue to only have access to the property through Cytec's secure main gate, which continues under the exclusive control of Cytec. Pursuant to an Employee Services Agreement, dated May 31, 2005, by and between Cytec Industries Inc. and CYRO Industries, Cytec provides 48 service employees to CYRO on a contract basis to operate the MMA plant and to provide related support functions.

7. Pursuant to a Site Services Agreement (Fortier Facility) dated May 31, 2005 by and between CYRO and Cytec Industries Inc., Cytec provides to CYRO a number of facility services integral

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to the CYRO MMA plant, including utilities, waste treatment, site transportation, maintenance, security and environmental and safety services.

8. Specific to the generation, management, and disposal of hazardous wastes generated by CYRO and services Cytec provides to CYRO with respect to such hazardous wastes, the Site Services Agreement provides as follows:

a. Pursuant to Para. 12(a), CYRO is required to conduct its operations in compliance with all applicable laws and consistent with applicable chemical industry standards, as they may change from time to time, concerning generally accepted good manufacturing practice, engineering design, and environmental health and safety performance.

b. Pursuant to Para. 12(c), CYRO is required to operate the CYRO MMA Plant in accordance with the safety, health and environmental policies of the Cytec Fortier Site.

c. Pursuant to Para. 12(g), CYRO is required to review and report safety, health and environmental information to Cytec in accordance in all material respects with Cytec's SHE policies. In the event of any release or discharge of a substance within or from the CYRO facility in violation of any SHE policy or any applicable law or permit, CYRO is required to promptly report such fact to the Cytec plant manager (in addition to making such notifications to government agencies as are required by law pursuant to Para. 12(a)).

d. Pursuant to Para. 4(a), Cytec provides to CYRO certain environmental services. As set forth in Exhibits 4(a)-4 and 10(a), such environmental services include the service of deepwell injection of certain liquid waste streams from the MMA plant. One category of liquid waste includes spent sulfuric acid, which is typically sent to Cytec's sulfuric acid regeneration unit as a feedstock (non-waste) but which may be injected when the Cytec sulfuric acid regeneration unit is able to regenerate. Disposal rate is measured by meter. CYRO is required to reduce the temperature of waste acid below 150 deg. F prior to disposal. All conveyance is via pipeline.

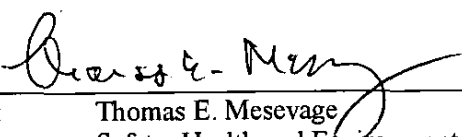
e. Also Pursuant to Para. 4(a), and as set forth in Exhibits 4(a)-4 and 10(a), Cytec provides management and deepwell disposal services with respect to wastewater generated in the MMA plant from such sources as dike sumps, scrubbers and runoff collection, and which is pumped to the Cytec Miscellaneous Effluent Treatment system owned and operated by Cytec pursuant to the Permit. There the waste is commingled with other Cytec unit wastewater for treatment and deepwell injection. All conveyance is via pipeline. As provided in Exhibit 10(a), CYRO may not increase the volume or rate of disposal through the Miscellaneous Effluent Treatment system beyond 50 gpm without the prior consent of Cytec.

f. Also pursuant to Exhibit 10(a), Cytec provides temporary storage and shipment preparation services with respect to certain CYRO wastes that are shipped off-site for disposal. These wastes include waste polymers and off-spec product, tars and universal wastes (e.g., batteries).

g. Exhibit 10(a) further mandates that CYRO not significantly change the constituents, concentrations, or characteristics of the waste streams sent to Cytec for management and disposal without Cytec's prior approval. Further identification of CYRO MMA plant waste streams to be managed by Cytec pursuant to Exhibit 10(a) of the Site Services Agreement is attached hereto as Exhibit A.

9. The sale of Cytec's partnership interest in CYRO to Degussa Specialty Polymers did not result in the transfer of any unit permitted under Cytec's Permit or which may be the subject of corrective action. Specifically, each permitted hazardous waste unit remains under the ownership and operational control of Cytec. Pursuant to the Permit and applicable law, Cytec remains responsible in the first instance for any corrective action that may be required with respect to such units.

I certify that the foregoing is true to the best of my knowledge and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



NAME: Thomas E. Mesevage
TITLE: Safety, Health and Environmental Counsel
Cytec Industries Inc.
DATE: 6-15-05

Exhibit A

5. Schedule for MMA Waste Streams to SITE OWNER

| | MMA Waste Stream to Site Owner | | | |
|----|--|-------------------------------|---|---|
| ID | Source | Destination | Requirements | Flow rates |
| | Vents | | | |
| 1 | ACH Waste Gas | AN AOG "A" or "B" or AN Flare | | Factored off Production |
| 2 | MMA Waste Gas | AN AOG "A" or "B" | | Factored off Production See example calculation for Dec.2004 |
| 3 | ACH Seal Pot # 5 | AN Flare | | Metered but not reliable |
| | Liquid | | | |
| 4 | Spent Acid | Acid Regen | See Acid Contract | Metered |
| 5 | | Deepwell | Temp < 150 Deg F | Metered |
| 6 | ACH Seal Drum Liquid | MET Header | PH adjusted to >6.5 | Estimated @ 2 gpm |
| 7 | ACH Wastewater Collection | MET Header | PH adjusted to >6.5 | Metered @ 4 gpm FI5098 |
| 8 | MMA Waste Water | MET Header | PH adjusted to >6.5 | Estimated @ 6 gpm |
| 8a | RIII/MM7 | | | |
| 8b | RII/MM6 | | | |
| 9 | MMA Lower Layer water | MET Return Header | | Estimated @ 6 gpm |
| 10 | MMA Scrubber Water | MET Header | PH adjusted to >6.5 | Not measured |
| 11 | MMA Tankfarm Scrubber Water | MET Header | PH adjusted to >6.5 | Not measured |
| 12 | MMA Tankfarm ACH Dike Sump | MET Header | PH adjusted to >6.5 | Estimated @ 1 gpm |
| 13 | MMA Tankfarm Railcar Spill Containment | MET Header | PH adjusted to >6.5 | Not measured |
| 14 | MMA Storm Sump | EOP | PH adjusted to >6.5 , low organic content | Metered |
| | | MET Return Header | PH adjusted to >6.5 | Metered @ 17 gpm |

| ID | Source | Destination | Requirements | Flow rates |
|----|--|-----------------------|---------------------|----------------------------------|
| 15 | MMA Cooling Tower Blowdown | EOP | PH adjusted to >6.5 | |
| 16 | MMA Crude Dike Sump | MET Header | PH adjusted to >6.5 | Included in MMS Storm Sump meter |
| 17 | MMA Emergency Crude Decant | MET Header | PH adjusted to >6.5 | Included in MMS Storm Sump meter |
| 18 | DEA Dike Sump | EOP | PH adjusted to >6.5 | Not measured |
| 19 | Methanol Tank Scrubber Water | MET | PH adjusted to >6.5 | Estimated @ 3 gpm |
| 20 | Plant Runoff | Intercept Ditch/EOP | PH adjusted to >6.5 | |
| | Solid Waste | | | |
| 21 | Cyanide Containing polymers, etc | Off site Inceneration | | |
| 22 | MTC Debris, Waste Acid Tars, etc | Kelvin landfill | | |
| 23 | MMA Product Polymers, Contaminated Product | Off site Inceneration | | |
| 24 | Universal Wastes (Batteries, Light Bulbs, etc) | ???? | | |